

FILED
LODGED

ENTERED
RECEIVED

MAR 15 2010

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY

Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

CHRISTIE BOWERS,

Plaintiff,

vs.

ROBIN KLETKE and ROBIN COHEN,
husband and wife and the marital community
composed thereof,

Defendants

) Case No.: C08-1768RSM

) DECLARATION OF DEFENDANTS IN
) SUPPORT OF DEFENDANT'S MOTION
) FOR MONETARY SANCTIONS

) NOTE ON MOTION DOCKET:
) APRIL 2, 2010

Defendants, Robin Kletke and Robin Cohen declare as follows:

1. We are the defendants in the above referenced case and are filing this declaration pro se.
2. Attached hereto as Exhibit A is a true and correct copy of a spread sheet detailing expenses and fees deemed as "unnecessary" by the Court's Order of March 1, 2010.
3. Attached hereto as Exhibit B are true and correct copies of time charges incurred by defendants regarding above referenced expenses.



08-CV-01768-PRO

1 Defendants declare under penalty of perjury that the foregoing is true and correct.

2
3 Dated this 15th Day of March, 2010 at Woodinville, WA

4 

5 Robin Cohen



6 Robin Kletke

7 16820 226th Ave NE
8 Woodinville, WA 98077
9 206-718-1237
10 robinkletke@hotmail.com
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

CERTIFICATE OF SERVICE

I, Robin Kletke, hereby certify that on March 15th, 2010, I filed with the Clerk of the Court and electronically mailed and mailed via US Mail the foregoing DECLARATION OF DEFENDANTS IN SUPPORT OF DEFENDANTS MOTION FOR MONETARY SANCTIONS, MARCH 1 2010 to the person(s) listed below:

Gregory J. Murphy, WSBA 16184
Law Offices of Gregory J. Murphy, PS
One Pacific Building
621 Pacific Avenue, Suite 15
Tacoma, WA 98401-1293
Counsel for defendants

Gregory Cavagnaro
Law Offices of Gregory Cavagnaro
1400 112th Avenue SE #100
Bellevue, WA 98004
Lead Attorney for Plaintiff

Mark Walters
1411 Fourth Avenue, Suite 75
Seattle, WA 98101
Attorney for Plaintiff

I certify under penalty of perjury, under the laws of the State of Washington, that the foregoing is true and correct.

Dated this 15th Day of March, 2010 at Woodinville, WA


Robin Cohen


Robin Kletke

EXHIBIT A

Exhibit A - Motion for Monetary Sanctions against Mr. Greg Cavagnaro, Plaintiff Attorney

Itemized charges from attorney invoices

	Greg Murphy Hours	Paralegal Hours	Total / line item	Designation referenced to Declaration Items	Description of Time Charges from statements
Hourly rate pre Jan. 1, 2009	\$ 300.00	\$ 120.00			
12/11/08	0.5		\$ 150.00	A	Draft stipulation and Proposed Order re Extension of Time
12/12/10	0.5	0.2	\$ 174.00	A	Preparation of Motion for Extension to respond since Cavagnaro did not communicate
12/15/08	1	1.6	\$ 492.00	A	More Prep on Motion for Extension
12/28/08	0.2		\$ 60.00	A	Review email regarding motion for extension of time
Hourly rate post Jan. 1, 2009	\$ 330.00	\$ 140.00			
4/1/09		0.2	\$ 28.00	B	Deal with Sonosite documents from sdt since Cavagnaro would not deliver them
4/2/09	0.2		\$ 66.00	B	Sonosite Docs
4/3/10		2.7	\$ 378.00	B	Sonosite Docs - copy and return originals
4/6/09		0.2	\$ 28.00	C	Prepare email to Cavagnaro regarding overdue discovery
4/7/09	1		\$ 330.00	C	Call to Cavagnaro regarding overdue docs, letter to Cavagnaro
4/21/09	1.3		\$ 429.00	C	Call and letter to Cavagnaro regarding late discovery
4/29/09	0.5		\$ 165.00	C	email to Cavagnaro about discovery - filing motion to compel
5/4/09	3		\$ 990.00	C	Email to Cavagnaro - begin motion to compel
5/5/09	1.6		\$ 528.00	C	draft declaration, motion, proposed order
5/6/09	1		\$ 330.00	C	prepare pleadings for filing
5/7/09	5		\$ 1,650.00	C	Continue working on motion
5/21/09	2	0.5	\$ 730.00	C	Review file RE motion, telephone call, etc
5/30/09	2.5		\$ 825.00	C	Review re: failure to respond, motion to dismiss, failure to prosecute/
6/3/09	0.8		\$ 264.00	C	Phone call regarding motion, contact with court clerk re motion
6/4/09	0.4		\$ 132.00	C	respond to items regarding motion to compel
6/29/09	4.7		\$ 1,551.00	D	Evaluate motion for dismissal
6/30/09	4.8		\$ 1,584.00	D	more work on 2nd motion to Compel
7/1/09	2.4		\$ 792.00	D	Proof and revise pleadings
7/2/09	6.3		\$ 2,079.00	D	More work on 2nd Motion
7/24/09	0.2	0.3	\$ 108.00	D	work on 2nd motion
8/11/09	0.2	0.2	\$ 94.00	D	review order granting 2nd motion
8/12/08	0.8		\$ 264.00	D	phone call about motion and options from here
8/25/09	0.2		\$ 66.00	D	Letter to Cavagnaro about fees and motion to dismiss
9/2/09	1.6		\$ 528.00	E	begin 3rd motion (1st motion to dismiss)
9/15/09	2	0.4	\$ 716.00	E	drafts and work on motion to compel, sanctions
9/16/09	1.2		\$ 396.00	E	research on motion, letter to Cavagnaro
9/17/09	2.1		\$ 693.00	E	draft motion, call to client
10/14/09	2.1	0.8	\$ 805.00	F	work for stipulation of extension due to cavagnaro's lack of participation
10/15/09	5.4		\$ 1,782.00	E	revise pleading, failure to conduct discovery
10/15/09		2.6	\$ 364.00	F	work on stipulation and contact with court
10/16/09	4.2		\$ 1,386.00	E	more work on 1st motion to dismiss and sanctions
10/19/09		6.1	\$ 854.00	E	work on motion

10/20/09	5.1	\$	1,683.00	E	work on motion and letter to cavagnaro
10/22/09	0.5	\$	165.00	E	review email from Cavagnaro - can't get the info, need to talk to client
10/23/09	2	\$	660.00	E	prepare pleadings for filing
10/23/09		0.7 \$	98.00	E	file pleadings
10/24/09	0.3	\$	99.00	E	send pleadings to client
					Contact with Cavagnaro about overdue discovery
11/6/09	1.4	\$	462.00	G	
11/16/09	4.3	1.6 \$	1,643.00	E	more work on motion to dismiss
11/20/09	5.9	\$	1,947.00	E	work on motion
11/22/09	2.8	\$	924.00	E	more on motion
11/27/09	1	\$	330.00	G	letter about overdue discovery
11/27/09		1.2 \$	168.00	E	Work on reply brief for motion
11/30/09	3.2	\$	1,056.00	H	motion to stay due to lack of activity
					phone call to cavagnaro regarding stipulation to stay
12/1/09	0.2	\$	66.00	H	
12/2/09	1.3	1.5 \$	639.00	H	motion to stay due to lack of activity
12/3/09	3.2	1 \$	1,196.00	H	motion to stay due to lack of activity
12/17/09	1.3	\$	429.00	I	prepare for discovery conference
12/18/09	3.6	\$	1,188.00	I	work on resetting deadlines
12/20/09	2.5	\$	825.00	I	draft motion to extend deadlines
					emails/phone calls regarding overdue discovery
12/24/09	0.3	0.9 \$	225.00	J	
12/28/09	4.6	2.5 \$	1,868.00	J	overdue discovery
					work on renewed motion to dismiss due to lack of discovery and cavagnaro's failure to prosecute.
12/28/09	10.1	\$	3,333.00	N	
					review emails and work on status conference
1/5/10	1.3	\$	429.00	K	regarding expert witness
1/6/10	0.2	\$	66.00	K	review email from court, etc
1/7/10	1.3	\$	429.00	K	expert witness conference
1/8/10		0.2 \$	28.00	L	email regarding tax forms
1/13/10		0.1 \$	14.00	L	tax forms
					work on declaration regarding expert witness, overdue discovery, and lack of attention by Cavagnaro
1/14/10	1	\$	330.00	M	
1/15/10	3.6	3.5 \$	1,678.00	M	declaration
1/19/10		0.1 \$	14.00	L	email for tax forms
					Draft declaration for renewed motion, revise, review
1/21/10	0.6	0.6 \$	348.00	N	
					draft of renewed motion to dismiss and sanctions
1/22/10	6.7	\$	2,211.00	N	
1/25/10	8	2.8 \$	3,032.00	N	Continue working on motion
1/26/10	3.9	5.1 \$	2,001.00	N	motion, pleadings, declarations
1/27/10	4.1	\$	1,353.00	N	work on argument for reply brief
2/9/10	3.8	0.7 \$	1,352.00	N	work on motion (reply)
2/11/10	5.7	\$	1,881.00	N	work on motion
2/12/10	8.1	\$	2,673.00	N	work on motion
Total		\$	58,654.00		

Total Charges per Item Described in Declaration

Declaration Designation	Total for each item	Description
A	\$ 876.00	(DKT #3) Motion for Extension to Answer
B	\$ 472.00	Failure to deliver Sonosite Subpoena results
C	\$ 6,401.00	(DKT #16) 1 st Motion to Compel
D	\$ 6,538.00	(DKT #22) 2 nd Motion to Compel
E	\$ 13,742.00	(DKT #30) Motion for Miscellaneous Relief
F	\$ 1,169.00	(DKT #27) Stipulation of extension of dates
G	\$ 792.00	Letters/emails/phone calls about overdue discovery
H	\$ 2,957.00	(DKT #36) Motion to stay
I	\$ 2,442.00	Preparation for another discovery conference about overdue discovery
J	\$ 2,093.00	emails / phone regarding overdue discovery
K	\$ 924.00	(DKT #40) Expert witness conference
L	\$ 56.00	Attempts to get overdue tax forms
M	\$ 2,008.00	(DKT #41) Work on declaration
N	\$ 18,184.00	(DKT #43) Motion for Sanctions
Total	\$ 58,654.00	

EXHIBIT B

2008/12/11

Date	Staff Member	Description	Hours	Charges
12/11/08	Gregory Murphy	Email to Robin Klatke about Notice of Appearance; draft Stipulation and Proposed Order re Extension of Time;	0.70	210.00
Total Fees for 2008/12/11:			0.70	210.00

A

2008/12/12

Date	Staff Member	Description	Hours	Charges
12/12/08	Audrey Cosgrove-Lewis	Prepare Stipulation and Proposed Order. CaseMap updates. Call to Cavagnaro re: Stipulation - left v.m. msg. Fax Stipulation to Cavagnaro. Prepare Motion for Extension of Time.	0.90	108.00
12/12/08	Gregory Murphy	Proof and revise Stipulation and [Proposed] Order extending Time to Answer or Otherwise Plead;	0.50	150.00
Total Fees for 2008/12/12:			1.40	258.00

A

2008/12/15

Date	Staff Member	Description	Hours	Charges
12/15/08	Audrey Cosgrove-Lewis	Edit Motion for Extension of Time to Answer. File Motion, proposed Order. Prepare	1.60	192.00
12/15/08	Gregory Murphy	Work on Motion for Extension of Time, re: " " "	5.30	1,590.00
Total Fees for 2008/12/15:			6.90	1,782.00

A

LO hr

2008/12/26

Date	Staff Member	Description	Hours	Charges
------	--------------	-------------	-------	---------

2008/12/28

Date	Staff Member	Description	Hours	Charges
------	--------------	-------------	-------	---------

Total Fees for 2008/12/28:

2008/12/29

Date	Staff Member	Description	Hours	Charges
------	--------------	-------------	-------	---------

12/29/08	Gregory Murphy	Continue working on answer; continue working on jury instructions; review docket; review email from court re motion for extension of time; email to Robin Kletke;	11.10	3,330.00
----------	----------------	---	-------	----------

Total Fees for 2008/12/29: 11.10 3,330.00

A.2.

2008/12/31

Date	Staff Member	Description	Hours	Charges
------	--------------	-------------	-------	---------

Total Fees for 2008/12/31:

Professional Fees (detail)**2009/04/01**

Date	Staff Member	Description	Hours	Charges
04/01/09	Gregory Murphy	Telephone to Cavagnaro re FRCP 26/37 conference; email to Cavagnaro;		
04/01/09	Lani Mertens	Telephone call from Ellie re Sonosite documents produced per subpoena	0.10	14.00
04/01/09	Lani Mertens	Telephone call with Ellie at Sonosite re documents produced to opposing counsel	0.10	14.00
Total Fees for 2009/04/01:			0.20	28.00

] B

2009/04/02

Date	Staff Member	Description	Hours	Charges
04/02/09	Gregory Murphy	Review documents received from Sonosite;	0.20	68.00
Total Fees for 2009/04/02:			0.20	68.00

B

2009/04/03

Date	Staff Member	Description	Hours	Charges
04/03/09	Lani Mertens	Receive Sonosite documents re subpoena duces tecum directly from Sonosite; copy all documents; prepare letter to Ellie Ausmus at Sonosite returning their original documents	2.70	378.00
Total Fees for 2009/04/03:			2.70	444.00

B

2009/04/04

Date	Staff Member	Description	Hours	Charges
------	--------------	-------------	-------	---------

Date	Staff Member	Description	Hours	Charges
04/06/09	Lani Mertens	Prepare email to Greg Cavagnaro re overdue responses to Defendants' first set of discovery	0.20	28.00
Total Fees for 2009/04/06:			0.20	28.00

C

2009/04/07

Date	Staff Member	Description	Hours	Charges
04/07/09	Gregory Murphy	Telephone call to Cavagnaro about answers and responses; letter to Cavagnaro; review documents received from Allyr;	1.30	429.00
Total Fees for 2009/04/07:			1.30	429.00

C 1.0 hr

3/18 - B

2009/04/21

Date	Staff Member	Description	Hours	Charges
04/21/09	Gregory Murphy	Telephone call to Cavagnaro; letter to Cavagnaro; update file;	1.30	429.00
04/21/09	Lani Mertens			

C

Total Fees for 2009/04/21:

2009/04/27

Date	Staff Member	Description	Hours	Charges
------	--------------	-------------	-------	---------

Total Fees for 2009/04/27:

2009/04/29

Date	Staff Member	Description	Hours	Charges
04/29/09	Gregory Murphy	Email to Cavagnaro; update file;	0.50	165.00

Total Fees for 2009/04/29:

C

2009/04/30

Date	Staff Member	Description	Hours	Charges
------	--------------	-------------	-------	---------

4/18 - B

Professional Fees (detail)**2009/05/04**

Date	Staff Member	Description	Hours	Charges
05/04/09	Gregory Murphy	Email to Cavagnaro re overdue discovery responses; begin working on Motion to Compel; review file;	3.00	990.00
Total Fees for 2009/05/04:			3.00	990.00

2009/05/05

Date	Staff Member	Description	Hours	Charges
05/05/09	Gregory Murphy	Draft declaration in support of motion to compel; draft motion to compel; draft proposed order;	1.60	528.00
Total Fees for 2009/05/05:			1.60	528.00

2009/05/06

Date	Staff Member	Description	Hours	Charges
05/06/09	Gregory Murphy	prepare pleadings	4.50	1,485.00
05/06/09	Lani Mertens	for filing;		
Total Fees for 2009/05/06:			4.50	1,527.00

2009/05/07

Date	Staff Member	Description	Hours	Charges
05/07/09	Gregory Murphy	Continue working on motion; telephone call to Wilson Lihn, June re subpoena; email to W. Lihn; letter to Lihn;	7.00	2,310.00
Total Fees for 2009/05/07:			7.00	2,310.00

2009/05/13

Date	Staff Member	Description	Hours	Charges
------	--------------	-------------	-------	---------

2009/05/21

Date	Staff Member	Description	Hours	Charges
05/21/09	Gregory Murphy	Review file re motion to compel and discovery matters; telephone call to Cavagnaro; letter to Cavagnaro; update file; draft reply declaration;	2.00	660.00
05/21/09	Lani Mertens	Prepare declaration of Gregory Murphy in reply to Defendants' unopposed motion to compel; file same with court	0.50	70.00
Total Fees for 2009/05/21:			2.50	730.00

2009/05/29

Date	Staff Member	Description	Hours	Charges
------	--------------	-------------	-------	---------

Total Fees for 2009/05/29:

2009/05/30

Date	Staff Member	Description	Hours	Charges
05/30/09	Gregory Murphy	Review file re discovery and failure to respond; research motion to dismiss for failure to prosecute and failure to answer discovery	2.50	825.00

Professional Fees (detail)**2009/06/03**

Date	Staff Member	Description	Hours	Charges
06/03/09	Gregory Murphy	Telephone call from Robin Kietke; telephone call to Laurie Cuaresma, Deputy Clerk; telephone call from Laurie Cuaresma;	0.80	264.00
06/03/09	Lari Mertens			

Total Fees for 2009/06/03: 1.60 362.00

2009/06/04

Date	Staff Member	Description	Hours	Charges
06/04/09	Gregory Murphy	Review email from Robin Kietke; reply; review email received from the court; email to Robin Kietke; update file;	0.40	132.00

Total Fees for 2009/06/04: 0.40 132.00

2009/06/27

Date	Staff Member	Description	Hours	Charges

2009/06/29

Date	Staff Member	Description	Hours	Charges
06/29/09	Gregory Murphy	Return telephone call from Robin Kietke; draft motion for dismissal or sanctions; research; revise motion to request an order to compel and pay costs and fees incurred;	4.70	1,551.00

Total Fees for 2009/06/29: 4.70 1,551.00

2009/06/30

Date	Staff Member	Description	Hours	Charges
06/30/09	Gregory Murphy	Review file and revise motion to compel; draft declaration in support; draft proposed order; additional research;	4.80	1,584.00

Total Fees for 2009/06/30: 4.80 1,584.00

Professional Fees (detail)**2009/07/01**

Date	Staff Member	Description	Hours	Charges
07/01/09	Gregory Murphy	Proof and revise pleadings for motion;	2.40	792.00
Total Fees for 2009/07/01:			2.40	792.00

D

2009/07/02

Date	Staff Member	Description	Hours	Charges
07/02/09	Gregory Murphy	Review email from Robin Kietke about motion to compel; revise motion; prepare pleadings for filing; revise and proof declaration;	6.30	2,079.00
Total Fees for 2009/07/02:			6.30	2,079.00

D

2009/07/24

Date	Staff Member	Description	Hours	Charges
07/24/09	Gregory Murphy	Proof declaration for filing;	0.20	66.00
07/24/09	Lani Mertens	Draft Reply Declaration of Gregory J. Murphy in Support of Defendant's Second Motion to Compel; file same with court	0.30	42.00
Total Fees for 2009/07/24:			0.50	108.00

D

Professional Fees (detail)**2009/08/11**

Date	Staff Member	Description	Hours	Charges
08/11/09	Gregory Murphy	Review Order Granting Second Motion to Compel and Awarding Sanctions;	0.20	66.00
08/11/09	Lari Mertens	Receive and review Order Granting 2nd Motion for Summary Judgment; forward same to clients for review	0.20	28.00
Total Fees for 2009/08/11:			0.40	94.00

2009/08/12

Date	Staff Member	Description	Hours	Charges
08/12/09	Gregory Murphy	Telephone call to Robin Klatke about options; telephone call from Robin Klatke;	0.80	264.00
Total Fees for 2009/08/12:			0.80	264.00

2009/08/24

Date	Staff Member	Description	Hours	Charges
------	--------------	-------------	-------	---------

2009/08/25

Date	Staff Member	Description	Hours	Charges
08/25/09	Gregory Murphy	Letter to Cavagnaro about fees and expenses or dismissal;	0.20	66.00
Total Fees for 2009/08/25:			0.20	66.00

Professional Fees (detail)**2009/09/02**

Date	Staff Member	Description	Hours	Charges
09/02/09	Gregory Murphy	Begin drafting motion; research motion;	1.60	528.00
Total Fees for 2009/09/02:			1.60	528.00

E

2009/09/09

Date	Staff Member	Description	Hours	Charges
09/09/09	Gregory Murphy	Email to Greg Cavagnaro about status;	0.20	66.00
Total Fees for 2009/09/09:			0.20	66.00

2009/09/14

Date	Staff Member	Description	Hours	Charges
09/14/09	Gregory Murphy	Review Bowers answers and objections to interrogatories; telephone call from Robin Kletke	1.30	429.00
09/14/09	Lani Mertens	Receive and review Bowers' answers to first and second set of discovery; scan and email to clients	0.40	56.00
Total Fees for 2009/09/14:			1.70	485.00

2009/09/15

Date	Staff Member	Description	Hours	Charges
09/15/09	Gregory Murphy	Draft declaration of GJM in support of Motion to Compel; review and update file;	2.00	660.00
09/15/09	Lani Mertens			
09/15/09	Lani Mertens	Work on Declaration of Gregory J. Murphy in support of motion	0.40	56.00
Total Fees for 2009/09/15:			3.40	884.00

E

2009/09/16

Date	Staff Member	Description	Hours	Charges
09/16/09	Gregory Murphy	Research re motion; letter to Greg Cavagnaro	1.20	396.00
09/16/09	Lani Mertens			
Total Fees for 2009/09/16:				

E

2009/09/17

Date	Staff Member	Description	Hours	Charges
09/17/09	Gregory Murphy	Draft motion; return telephone call from Robin Kletke	2.10	693.00
Total Fees for 2009/09/17:			2.10	693.00

E

2009/09/18

Date	Staff Member	Description	Hours	Charges
------	--------------	-------------	-------	---------

2009/09/29

Date	Staff Member	Description	Hours	Charges
0				

9/18 - B

Professional Fees (detail)**2009/10/14**

Date	Staff Member	Description	Hours	Charges
10/14/09	Gregory Murphy	Review file; telephone call to Gregory Cavagnaro; email to Cavagnaro about extending certain deadlines; email from Gregory Cavagnaro; telephone call from Robin Kletke; email to Robin Kletke; telephone call from Robin Cohen;	2.10	693.00
10/14/09	Lani Mertens	Receive and review email from opposing counsel; finalize stipulation and order, scan and file with court, email to judge for approval and signature	0.30	42.00
10/14/09	Lani Mertens	Draft stipulation and order to extend discovery deadlines; email to opposing counsel for approval	0.50	70.00
Total Fees for 2009/10/14:			2.90	805.00

2009/10/15

Date	Staff Member	Description	Hours	Charges
10/15/09	Gregory Murphy	Review file; revise letter and pleadings; review research; work on argument about Bowers' failure to conduct discovery;	5.40	1,782.00
10/15/09	Lani Mertens	Emails from/to Greg Cavagnaro re stipulation and order to extend discovery deadlines	0.20	28.00
10/15/09	Lani Mertens	Receive and review email from Judge Martinez' clerk re stipulation and order to extend discovery deadlines; send email to Judge Martinez clerk re same	0.20	28.00
10/15/09	Lani Mertens	Work on motion to strike pleadings, enter default and for sanctions	2.20	308.00
Total Fees for 2009/10/15:			8.00	2,146.00

2009/10/16

Date	Staff Member	Description	Hours	Charges
10/16/09	Gregory Murphy	Continue working on motion and research; review file about next-steps;	4.20	1,386.00
Total Fees for 2009/10/16:			4.20	1,386.00

2009/10/19

Date	Staff Member	Description	Hours	Charges
10/19/09	Lani Mertens	Work on motion to strike and Murphy Declaration	6.10	854.00
Total Fees for 2009/10/19:			6.10	854.00

2009/10/20

Date	Staff Member	Description	Hours	Charges
10/20/09	Gregory Murphy	Continue work on motion and letter; revise; proof and prepare for sending to Cavagnaro;	5.10	1,683.00
Total Fees for 2009/10/20:			5.10	1,683.00

2009/10/22

Date	Staff Member	Description	Hours	Charges
10/22/09	Gregory Murphy	Review email received from Cavagnaro; reply;	0.50	165.00
Total Fees for 2009/10/22:			0.50	165.00

2009/10/23

Date	Staff Member	Description	Hours	Charges
10/23/09	Gregory Murphy	Review email received from Cavagnaro; prepare pleadings for filing; update file; email to Robin Kletke;	2.00	660.00

10/18 - B

2009/10/23

Date	Staff Member	Description	Hours	Charges
10/23/09	Lari Mertens	Edit and finalize pleadings; file with court	0.70	98.00
Total Fees for 2009/10/23:			2.70	758.00

E

2009/10/24

Date	Staff Member	Description	Hours	Charges
10/24/09	Gregory Murphy	Email to clients with motion and declaration; forward email received from Cavagnaro;	0.30	99.00
Total Fees for 2009/10/24:			0.30	99.00

E

Professional Fees (detail)**2009/11/08**

Date	Staff Member	Description	Hours	Charges
------	--------------	-------------	-------	---------

2009/11/08

Date	Staff Member	Description	Hours	Charges
11/08/09	Gregory Murphy	Telephone call to Cavagnaro; letter to Cavagnaro; revise and proof letter; review emails from Cavagnaro, amended answers to interrogatories, letter about discovery issues; forward to Robin Kietke; email to Robin Kietke;	1.40	462.00

Total Fees for 2009/11/08:			1.40	462.00
----------------------------	--	--	------	--------

2009/11/16

Date	Staff Member	Description	Hours	Charges
11/16/09	Gregory Murphy	Review email from Robin Kietke about discovery and pending motion; review pleadings received from Cavagnaro; draft declaration; research; draft memo;	4.30	1,419.00
11/16/09	Lari Mertens	Work on gathering exhibits for declaration and declaration	1.60	224.00
Total Fees for 2009/11/16:			5.90	1,643.00

2009/11/17

Date	Staff Member	Description	Hours	Charges
------	--------------	-------------	-------	---------

2009/11/17

Date	Staff Member	Description	Hours	Charges
11/20/09	Gregory Murphy	Work on motion; update declaration concerning Cavagnaro's other cases; update file about discovery status and documents in support of motion to strike; telephone call to Cavagnaro; email to Cavagnaro; review	5.90	1,947.00

12/18 - B

2009/11/20

Date	Staff Member	Description	Hours	Charges
		ply;		

2009/11/22

Date	Staff Member	Description	Hours	Charges
11/22/09	Gregory Murphy	Research and work on motion to require compliance with order granting sanctions; revise and proof order granting motion to strike;	2.80	924.00
Total Fees for 2009/11/22:			2.80	924.00

E

2009/11/24

Date	Staff Member	Description	Hours	Charges

2009/11/25

Date	Staff Member	Description	Hours	Charges

2009/11/27

Date	Staff Member	Description	Hours	Charges
11/27/09	Gregory Murphy	Review documents received from Bowers; memo to Lani Mertens; letter to Cavagnaro about discovery; proof and revise letter;	2.00	660.00
11/27/09	Lani Mertens	Work on reply brief and declaration; prepare for filing and service	1.20	168.00
Total Fees for 2009/11/27:			3.20	828.00

G 1.0 hr
E**2009/11/30**

Date	Staff Member	Description	Hours	Charges
11/30/09	Gregory Murphy	Emails from/to Robin Cohen; research and draft motion to stay;	3.20	1,056.00
Total Fees for 2009/11/30:			3.20	1,056.00

H

Professional Fees (detail)**2009/12/01**

Date	Staff Member	Description	Hours	Charges
12/01/09	Gregory Murphy	Telephone call to Cavagnaro about Stipulation to Stay Discovery per FRCP 26(c);	0.20	66.00
Total Fees for 2009/12/01:			0.20	66.00

2009/12/02

Date	Staff Member	Description	Hours	Charges
12/02/09	Gregory Murphy	Email to Cavagnaro; proof and revise motion	1.30	429.00
12/02/09	Lani Mertens	Draft declaration of Greg Murphy re Motion to Stay; work on motion to stay	1.50	210.00
Total Fees for 2009/12/02:			2.80	639.00

2009/12/03

Date	Staff Member	Description	Hours	Charges
12/03/09	Gregory Murphy	Finish revisions to motion and declaration; draft proposed order; review research authorities;	3.20	1,056.00
12/03/09	Lani Mertens	Draft Order Granting Defendants' Motion to Stay; revise motion and declaration	1.00	140.00
Total Fees for 2009/12/03:			4.20	1,196.00

2009/12/11

Date	Staff Member	Description	Hours	Charges
------	--------------	-------------	-------	---------

2009/12/16

Date	Staff Member	Description	Hours	Charges
------	--------------	-------------	-------	---------

2009/12/17

Date	Staff Member	Description	Hours	Charges
------	--------------	-------------	-------	---------

12/17/09	Gregory Murphy	Prepare for discovery conference; email to Cavagnaro; telephone call to Cavagnaro; email to Cavagnaro; telephone call from Cavagnaro;	1.30	429.00
----------	----------------	---	------	--------

Total Fees for 2009/12/17:			1.30	429.00
----------------------------	--	--	------	--------

2009/12/18

Date	Staff Member	Description	Hours	Charges
------	--------------	-------------	-------	---------

12/18/09	Gregory Murphy	Review file re deadlines, discovery and next steps; letter to Cavagnaro; review claims; telephone call to Robin Kletke; work on resetting deadlines; email from/to Robin Kletke;	3.60	1,188.00
----------	----------------	--	------	----------

Total Fees for 2009/12/18:			3.60	1,188.00
----------------------------	--	--	------	----------

2009/12/20

Date	Staff Member	Description	Hours	Charges
------	--------------	-------------	-------	---------

12/20/09	Gregory Murphy	Draft motion to change deadlines; review file concerning computer forensic experts and additional discovery;	2.50	825.00
----------	----------------	--	------	--------

Total Fees for 2009/12/20:			2.50	825.00
----------------------------	--	--	------	--------

2009/12/22

Date	Staff Member	Description	Hours	Charges
------	--------------	-------------	-------	---------

2009/12/24

Date	Staff Member	Description	Hours	Charges
------	--------------	-------------	-------	---------

12/24/09	Gregory Murphy	Telephone call to Lari Mertens about documents from Greg Cavagnaro; telephone call to Greg Cavagnaro;	0.30	99.00
----------	----------------	---	------	-------

12/24/09	Lari Mertens	Multiple telephone calls (5) to Plaintiff's counsel re Plaintiff's overdue answers/responses to discovery requests	0.40	56.00
----------	--------------	--	------	-------

12/24/09	Lari Mertens	Prepare email to opposing counsel re Plaintiff's answers/responses that were ordered to be due 12/24/09; prepare fax to opposing counsel re same and attempted to fax message 2 times;	0.50	70.00
----------	--------------	--	------	-------

Total Fees for 2009/12/24:			1.20	225.00
----------------------------	--	--	------	--------

2009/12/28

Date	Staff Member	Description	Hours	Charges
------	--------------	-------------	-------	---------

12/28/09	Gregory Murphy	Conference with Lari Mertens about review of documents received from Cavagnaro; telephone call to Cavagnaro about expert witness disclosure and supplemental answers to interrogatories; letter to Cavagnaro about conference with Judge Martinez; work on discovery matters;	4.60	1,518.00
----------	----------------	---	------	----------

12/28/09	Lari Mertens	Receive and review responsive documents to requests for production; draft letter to plaintiff's counsel re missing documents, etc and to request signature on IRS forms	2.30	322.00
----------	--------------	---	------	--------

12/28/09	Lari Mertens	Receive email from opposing counsel re overdue answers and responses; email opposing counsel to acknowledge receipt of his email	0.20	28.00
----------	--------------	--	------	-------

Total Fees for 2009/12/28:			7.10	1,868.00
----------------------------	--	--	------	----------

Professional Fees (detail)**2010/01/05**

Date	Staff Member	Description	Hours	Charges
01/05/10	Gregory Murphy	Review email from Robin Kletke; telephone call to Robin Kletke; telephone call from Laurie Cuaresma about status conference; email to clients; email to Court;	1.30	429.00
Total Fees for 2010/01/05:			1.30	429.00

K

2010/01/06

Date	Staff Member	Description	Hours	Charges
01/06/10	Gregory Murphy	Review email from Lowell Williams; email to clients; email to court;	0.20	66.00
Total Fees for 2010/01/06:			0.20	66.00

K

2010/01/07

Date	Staff Member	Description	Hours	Charges
01/07/10	Gregory Murphy	Review file and prepare for status conference; attend status conference; telephone call to Robin Kletke;	1.30	429.00
Total Fees for 2010/01/07:			1.30	429.00

K

2010/01/08

Date	Staff Member	Description	Hours	Charges
01/08/10	Lani Mertens	Draft email to Greg Cavagnaro re tax forms	0.20	28.00
Total Fees for 2010/01/08:			0.20	28.00

L

2010/01/12

Date	Staff Member	Description	Hours	Charges
------	--------------	-------------	-------	---------

2010/01/13

Date	Staff Member	Description	Hours	Charges
01/13/10	Lani Mertens	Email to Cavagnaro re status on tax forms	0.10	14.00
Total Fees for 2010/01/13:			0.10	179.00

L

2010/01/14

Date	Staff Member	Description	Hours	Charges
01/14/10	Gregory Murphy	Review email from Robin Kletke; telephone call to Robin Kletke; review docket; telephone call to Robin Kletke; email to Courtroom Deputies for Judge Martinez requesting a telephone conference;	1.00	330.00
Total Fees for 2010/01/14:			1.00	330.00

M

2010/01/15

Date	Staff Member	Description	Hours	Charges
01/15/10	Gregory Murphy	Work on document showing details of discovery for court; review email from Lowell Williams; draft declaration; telephone call to Robin Kletke; telephone call from Robin Kletke	3.60	1,188.00
01/15/10	Lani Mertens	Prepare exhibit for GJM declaration; file and serve declaration	3.50	490.00
Total Fees for 2010/01/15:			7.10	1,678.00

M

2010/01/19

Date	Staff Member	Description	Hours	Charges
01/19/10	Lani Mertens	Email to Greg Cavagnaro re status on tax forms	0.10	14.00
Total Fees for 2010/01/19:			0.10	14.00

L

2010/01/21

Date	Staff Member	Description	Hours	Charges
01/21/10	Gregory Murphy	Draft second declaration in support of renewed motion; revise; review Order; email to clients;	0.80	284.00
01/21/10	Lani Mertens	Draft second GJM declaration in support of renewed motion to strike, etc.	0.60	84.00
Total Fees for 2010/01/21:			1.40	368.00

N

2010/01/22

Date	Staff Member	Description	Hours	Charges
01/22/10	Gregory Murphy	Telephone call from Robin Kletke about Order and next motion; begin drafting motion	6.70	2,211.00
Total Fees for 2010/01/22:			6.70	2,211.00

N

2010/01/25

Date	Staff Member	Description	Hours	Charges
01/25/10	Gregory Murphy	Continue working on motion;	8.00	2,640.00
01/25/10	Lani Mertens	Review file, gather documents for declarations; draft GJM declarations re requests for admissions and Debra Cooper	2.80	392.00
Total Fees for 2010/01/25:			10.80	3,032.00

N

2010/01/26

Date	Staff Member	Description	Hours	Charges
01/26/10	Gregory Murphy	Email from Robin Kletke; reply; continue working on motion; work on declarations; proof and revise pleadings; review emails from Robin Kletke; telephone call to Robin Kletke;	3.90	1,287.00
01/26/10	Lani Mertens	Continue working on GJM declaration re Debra Cooper; revise GJM declaration re tax forms	1.40	196.00
01/26/10	Lani Mertens	Revise declarations; prepare for filing and service	3.50	490.00
01/26/10	Lani Mertens	Telephone calls with client re motion for sanctions	0.20	28.00
Total Fees for 2010/01/26:			9.00	2,001.00

N

2010/01/27

Date	Staff Member	Description	Hours	Charges
01/27/10	Gregory Murphy	Work on argument for reply brief; research re same;	4.10	1,353.00
Total Fees for 2010/01/27:			4.10	1,353.00

N

2010/02/09

Date	Staff Member	Description	Hours	Charges
02/09/10	Gregory Murphy	Work on motions; draft proposed order re stay;	3.80	1,254.00
02/09/10	Lani Mertens	Draft proposed Order; prepare pleadings to be filed and served	0.70	98.00
Total Fees for 2010/02/09:			4.50	1,352.00

N

2010/02/11

Date	Staff Member	Description	Hours	Charges
02/11/10	Gregory Murphy	Telephone call from Mark Walters; email to Mark Walters about staying discovery; telephone call from Robin Kletke; work on motion:	5.70	1,881.00
Total Fees for 2010/02/11:			5.70	1,881.00

N

2010/02/12

Date	Staff Member	Description	Hours	Charges
02/12/10	Gregory Murphy	Continue working on motion;	8.10	2,673.00
Total Fees for 2010/02/12:			8.10	2,673.00

N